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6 *Attorney for Defendant/Counterclaimant iProov Ltd.*

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 FACETEC, INC., a Delaware corporation,
Plaintiff,

11 v.

12 iPROOV LTD, a United Kingdom limited
13 liability company,
Defendant.

Case No. 2:21-cv-02252-ART-BNW

**DECLARATION OF RYAN E.
HATCH IN SUPPORT OF
DEFENDANT IPROOV'S
MOTION FOR PARTIAL STAY**

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15 iPROOV LTD, a United Kingdom limited
16 liability company,
Counter-Claimant,

17 v.

18 FACETEC, INC., a Delaware corporation,
19 Counter-Defendant.

20 I, Ryan E. Hatch, declare as follows:

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22 1. I am an attorney duly licensed to practice law before all courts of the State of
23 California and am principle at Hatch Law, PC, 13323 W. Washington Blvd., Suite 302, Los
24 Angeles, CA 90066. I am an attorney for Defendant and Counterclaimant iProov, Ltd. ("iProov") in
25 this action against Plaintiff and Counterdefendant FaceTec, Inc. ("FaceTec"). I have personal
26 knowledge of the facts stated therein. If called upon to testify, could and would testify competently
27 to the following facts.
28

1 2. The parties are still in discovery in the above-caption action, and, to date, only one
2 deposition has taken place.

3 3. I also represent iProov in connection with *FaceTec, Inc. v. Jumio Corporation*, No.
4 3:24-cv-03623-RFL, filed by FaceTec on June 14, 2024 in the United States District Court for the
5 Northern District of California (the “California Action”).

6 4. Attached hereto as Exhibit A is a true and correct copy of the parties’ Joint Case
7 Management Statement filed in the California Action on September 12, 2024 as Docket Entry 32.

8 5. Attached hereto as Exhibit B is a true and correct copy of Jumio Corporation
9 (“Jumio”)’s Motion to Stay filed in the California Action on November 27, 2024 as Docket Entry
10 54.

11 6. Attached hereto as Exhibit C is a true and correct copy of FaceTec’s Memorandum
12 in Opposition to Jumio’s Motion to Stay filed in the California Action on December 16, 2024 as
13 Docket Entry 62.

14 7. On February 6, 2025 the Clerk in the California Action entered Docket Entry 82
15 giving notice that Jumio’s Motion to Stay, along with other pending motions, was “submitted
16 without oral argument” and that “[t]he Court will issue a written order on the motions.”

17 8. Attached hereto as Exhibit D is a true and correct copy of a screenshot of FaceTec’s
18 publicly available website, available at www.facetec.com and accessed on January 31, 2025.

19 9. Attached hereto as Exhibit E is a true and correct copy of the PTAB Trial Statistics
20 FY24 End of Year Outcome Roundup IPR, PGR (available at
21 https://www.uspto.gov/sites/default/files/documents/ptab_aia_fy2024_roundup.pdf).

22 I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing is true and correct.
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1 Executed this day of February 10, 2025, at Los Angeles, California.

2
3 By: /s/ Ryan E. Hatch
4 RYAN E. HATCH (SBN 235577)
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13 *iProov Ltd.*
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